

DEPARTMENT OF SOCIAL SERVICES
744 P Street, Sacramento, CA 95814
(916) 445-7046



March 30, 1983

ALL-COUNTY LETTER NO. 83-31

ALL COUNTY WELFARE DIRECTORS
ALL COUNTY AUDITORS
ALL COUNTY FISCAL OFFICERS

SUBJECT: EMERGENCY ASSISTANCE-ABUSED, NEGLECTED, AND EXPLOITED CHILDREN
PROGRAM (EA-ANEC)

The Department of Health and Human Services (DHHS) notified this Department that Federal Financial Participation (FFP) for the Emergency Assistance - Abused, Neglected, and Exploited Children Program (EA-ANEC) has been deferred for the quarter ending September 1982. DHHS has also indicated that the same action will be taken for all subsequent quarters until a number of problems are resolved.

The DHHS decision to defer the EA-ANEC expenditures is the result of limited federal onsite county reviews of California's Emergency Assistance Program. During these reviews, Federal staff found that county records reflect a lack of completed application forms, incomplete case information, an absence of case documentation, improper eligibility determinations, and absence of a clear audit trail for the social services component of the program.

In order to rectify these problems and insure county compliance, this letter restates and clarifies various existing program requirements and instructions. This letter also establishes additional procedures necessary to insure an accurate and accessible audit trail for the EA-ANEC Program.

APPLICATION (SOC 349) COMPLETION

The Emergency Assistance Application/Eligibility Determination form (SOC 349) is essential to the claiming of emergency assistance funds. It is imperative that this form be accurately and fully completed for each emergency assistance case. As stated in the instructions on the reverse of the SOC 349, the social worker and/or eligibility worker must complete and sign all applicable portions of the form. Form sections A, B, and F must be completed and signed for every emergency assistance case. Sections C, D, or E, as applicable to the individual case, must be completed and signed for every emergency assistance case. If the family/child is determined eligible for EA-ANEC on the basis of current AFDC-FG/U or AFDC-FC eligibility, the AFDC case number must be entered in section C or D as appropriate. All appropriate supporting eligibility documentation must be maintained in either the services or the income maintenance case record. This includes the CA 2 or FC 2 completed for non-AFDC children determined eligible for EA-ANEC.

EA SERVICES TIME DOCUMENTATION

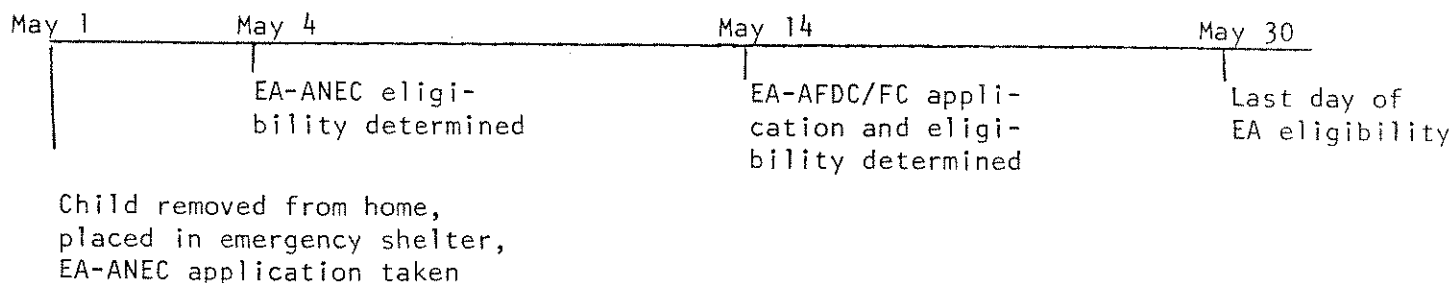
As a further auditable documentation effort, the services case worker shall maintain a log of services time expended for each emergency assistance case. This log must be retained in the emergency assistance case record, and shall be maintained on an ongoing basis during the emergency assistance aid period. This log will provide the case by case identification and documentation of EA services time expended as required by the federal DHHS auditors.

Attached is an example of an EA Services Time Documentation Log. Counties may utilize the suggested format of this attachment, or may develop one of their own. It is essential, however, that every EA case record contain such a log indicating date, time expended, and a brief description for each emergency assistance service provided.

Time Study and Claiming Instructions

Again, counties are reminded that only that time spent by social services staff providing and/or arranging EA services for children/families who have been determined eligible for EA-ANEC can be charged to the EA Program. All time spent by social services staff prior to the actual EA eligibility determination is to be charged to the appropriate OCSS program. However, EA-ANEC allowable direct service costs (i.e., emergency shelter) are to be charged to EA-ANEC beginning with the date services are initiated (date of application).

Example:



In the above example, the social worker is to commence charging time to EA-ANEC on May 4, the date eligibility has been determined. All time spent prior to this date is to be charged to the appropriate OCSS program. Since all allowable direct services provided to an EA eligible child are to be charged to the EA Program commencing with the date of application, Emergency Shelter costs, as shown in the example above, are eligible for EA funding effective May 1.

After the thirty-day eligibility period expires, all time and direct service costs are to be charged to the appropriate OCSS program.

County Operated Emergency Shelter Facility

It has been brought to our attention that there is also the need to clarify the EA-ANEC claiming procedures applicable to county operated emergency shelter facilities. Provided below are the procedures to be followed when determining and claiming costs of these facilities.

Personal Services

Social services staff who work full time at a shelter home are required to maintain continuous time records of the hours attributable to each service program. These time studies are used as the basis for direct charging the social worker's salaries and benefits to program on the DFA 325.3, Group III, A. 1. Personal Services. Please Note: These time studies are not included when completing the DFA 47. Social Services Time Study Summary. They must however, be maintained at the county for audit purposes.

Therefore, when an EA-ANEC eligible child is placed in a county operated emergency shelter facility, the social services staff are to identify time spent to the EA-ANEC Program in accordance with the instructions provided in All-County Letter 82-67 and as clarified in this letter.

Shelter Operating Costs

As you know, the operating costs of the county shelter home are distributed to program based on the daily child occupancy count. (These counts are subject to the 14 day, 30 day with supervisory approval, limitation for funding purposes.)

The counties are reminded that when computing the daily child occupancy count for distributing the operating costs of the shelter, counties are to charge to EA-ANEC, only those children who have been determined eligible for the EA-ANEC Program.

Abatements

Immediately upon discovering that an improper EA payment has been made, counties are required to abate the amount determined to be incorrect. This includes the cost of social services provided to ineligible and cash grant overpayments. After an abatement is made, any amount that is subsequently collected is to be retained by the county.

Audit Trail

The following procedures must be followed to insure an accurate and accessible audit trail:

A complete SOC 349 with the applicable eligibility supporting documentation (CA 2 or FC 2) must be on file for each child receiving EA-ANEC services. Again, it is stressed that Section F of the SOC 349 must be completed and the applications display all the appropriate signatures.

If the family and/or child is determined eligible for EA-ANEC on the basis that the child/family is receiving AFDC, then the AFDC-FG/U or AFDC-FC Case Number must be entered on the SOC 349 in Section C or D, as appropriate. This will provide the cross reference needed to verify that eligibility requirements have been met.

When a direct service is purchased on behalf of an EA-ANEC eligible child/family, counties must have the capability of identifying direct service costs purchased on behalf of each case.

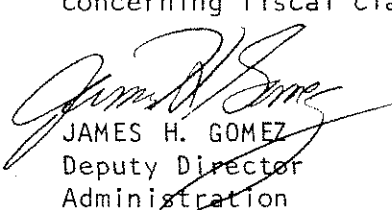
Counties must maintain a comprehensive listing of all EA-ANEC cases. If a countywide list is not feasible, then counties shall establish a process with the capability of identifying and locating all EA-ANEC cases for review and audit purposes.

In order to avoid future deferrals and the possible disallowance of federal funding, counties are urged to comply with the EA Program regulations and policies released by this Department. The Family and Children's Services Program Operations staff will soon be making field visits to monitor county efforts to assure EA-ANEC case documentation and to assist counties in resolving any problems.

However, counties remain responsible for proper determinations, claiming and documentation, and should ensure that appropriate internal controls are in place. We also strongly recommend that counties review all prior and existing cases and claims to ensure that only allowable costs for eligible cases were claimed.

Additionally, since the Other County Social Services (OCSS) allocations were developed on the basis that 50 percent federal funding under Title IV-A would be available, counties should continue to claim to the EA Program those costs which are EA eligible.

Should you have any questions regarding the EA-FS and EA-ESC Program, please contact Family and Children's Services Program Operations Bureau at (916) 445-7653 (ATSS 485-7653). Questions concerning EA-Foster Care, should be directed to Foster Care Program Bureau at (916) 445-0813 (ATSS 485-0813). For any questions concerning fiscal claiming contact Fiscal Policy and Procedures Bureau (916) 445-7046.



JAMES H. GOMEZ
Deputy Director
Administration

Attachments

EMERGENCY ASSISTANCE SERVICES TIME DOCUMENTATION LOG

CASE NAME: Smith, John

CASE RECORD NUMBER: 30-5782372

BEGINNING DATE OF AID: November 5, 1982

ENDING DATE OF AID: December 5, 1982

NAME OF SOCIAL WORKER(S)

1. <https://www.irs.gov/efile/efile-1041-essentials>
2. <https://www.irs.gov/efile/efile-1041-essentials>
3. <https://www.irs.gov/efile/efile-1041-essentials>

[illegible]

EMERGENCY ASSISTANCE SERVICES TIME DOCUMENTATION LOG

CASE NAME: _____ CASE RECORD NUMBER: _____

BEGINNING DATE OF AID: _____ ENDING DATE OF AID: _____

NAME OF SOCIAL WORKER(S)

1. _____ 2. _____ 3. _____

[illegible]